

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

**TRAILSEDGE OWNERS ASSOCIATION,
INC.,**

Plaintiff

CIVIL ACTION NO.:

2:23-CV-00090

- v -

**NED SKI ASSOCIATES, LLC, LAUDON
ASSOCIATES, INC., ESTATE OF DONALD
A. KLEPACKI, LAUREL G. KLEPACKI,
JOSEPH KLEPACKI, and BLUE MOON
DESIGN ARCHITECTURAL DESIGN, LLC,
Defendants.**

**NED SKI ASSOCIATES, LLC, LAUDON
ASSOCIATES, INC., ESTATE OF DONALD A. KLEPACKI,
LAUREL G. KLEPACKI and JOSEPH KLEPACKI,
Third-Party Plaintiffs**

-v-

**MIKE JARVIS, DENNIS RAWSON, MIKE DAVIS,
STEVE DOSTAL, PAUL DULUBAC,
HAMILTON CONSTRUCTION, LLC,
STEVENS ROOFING & SIDING,
SPRAGUE STONEWORK d/b/a VERMONT STONEWORK
SVT MASONRY, LLC and CHRIS BARNEY MASONRY
Third-Party Defendants**

**ASSENTED-TO (IN PART) MOTION TO
EXTEND TIME FOR ANSWER OF THIRD
PARTY DEFENDANT SPRAGUE
STONEWORK d/b/a VERMONT
STONEWORK**

NOW COMES the Defendants/Third-Party Plaintiffs, NED Ski Associates, LLC, Laudon Associates, Inc., Estate of Donald, A. Klepacki, Laurel G. Klepacki, and Joseph Klepacki, through the undersigned local counsel, and hereby moves this Honorable Court to extend the time for the Third-Party Defendant, Sprague Stonework d/b/a Vermont Stonework to Answer the Third-Party Complaint. As grounds therefore, Defendant/Third-Party Plaintiff says:

1. On May 12, 2023, the Plaintiff Trailsedge Owners Association, Inc. filed a Complaint with the United States District Court – District of Vermont with regards to multiple alleged defects with the design and construction of a seven-building condominium complex consisting of twenty-four residential units.

2. On April 15, 2024 the Defendants filed their Third-Party Complaint naming ten (10) third-party defendants.

3. On July 24, 2024 the Third-Party Defendant Sprague Stonework d/b/a Vermont Stonework was served. The last of the third-party defendants was served on August 8, 2024.

4. Counsel for the Defendant/Third-Party Plaintiff has been contacted by a representative for Sprague Stonework d/b/a Vermont Stonework requesting an additional thirty (30) days to answer the Third-Party Complaint.

5. Given the short duration of the extension requested, the reasonableness of the request, and the fact that many of the third-party defendants have yet to file their own answers, counsel for the Defendant/Third-Party Plaintiff agreed to the extension.

6. Counsel for the Plaintiff Trailsedge Owners Association, Inc. has assented to a fourteen (14) day extension. He does not assent for the longer period of the requested extension.

WHEREFORE, the Third-Party Plaintiffs respectfully requests this Honorable Court:

- A. Extend the time for service for Sprague Stoneworks d/b/a Vermont Stonework to Answer the Third-Party Complaint until September 13, 2024; and
- B. Enter such other relief as the Court deems just and proper.

Respectfully submitted,

**NED SKI ASSOCIATES, LLC, LAUDON
ASSOCIATES, INC., ESTATE OF DONALD,
A. KLEPACKI, LAUREL G. KLEPACKI, JOSEPH
KLEPACKI,**

By Their Attorneys,

GETMAN, SCHULTHESS, STEERE & POULIN, PA

Dated: August 14, 2024

By: /s/ Debbie Lorusso Makris
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